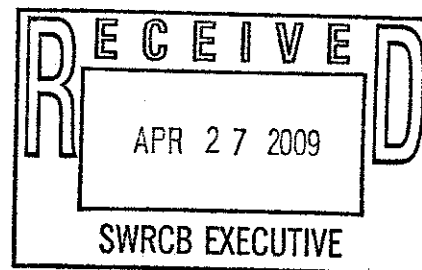




PEBBLE BEACH
COMPANY

April 22, 2009



Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Re: **Comment Letter - Draft Statewide General Waste Discharge Requirements For Landscape Irrigation Uses of Municipal Recycled Water**

Dear Chair Doduc and State Board Members:

Pebble Beach Company ("PBC") appreciates the opportunity to comment on the Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water ("General Permit"), as required by Assembly Bill 1481 ("AB 1481"). PBC notes that AB 1481 grants the Water Board the authority to increase the usage of recycled water, a valuable resource and critical component of California's water supply. We look to the Water Board to facilitate the expansion of recycled water use in a safe and practical manner through the development of a General Permit that is supportive and not overly prohibitive.

PBC owns and operates three world-class resort hotels, an award-winning spa, and four championship golf courses in the Del Monte Forest and the adjoining City of Monterey. We believe that the increased use of recycled water is essential to continuing public support and growth of our industry. Therefore, we continue to develop and refine our recycled water operations, through continued work on our \$67M Wastewater Reclamation Project at the Carmel Area Wastewater District's treatment plant and operational efficiencies around the resorts. We remind the Water Board that the Reclamation Project converts locally generated wastewater to high-quality recycled water suitable for irrigating the historic golf courses of the Del Monte Forest, replacing the need for potable water in these areas. An added benefit is that the Reclamation Project has vastly reduced the amount of treated wastewater that previously had been discharged into Carmel Bay, and thus has contributed to the improvement of ocean water quality in this area. We look to the Board to support our conservation efforts.

The Water Board and staff's efforts with the Recycled Water Policy and this General Permit are laudable. However, after careful review, PBC has a number of recommendations. We respectfully offer them for your consideration.

1. Finding 26, Order - Prohibition A (8)

The Prohibition states:

LEGAL AFFAIRS

8. The use of recycled water, pursuant to this General Permit, where there is evidence that Emerging Constituents/Chemicals of Emerging Concern (CECs) are a concern, as determined by CDPH, is prohibited.

Issue: The science of CECs is too preliminary. More research is needed so that these regulations can be framed in a more informed and clearly defined manner. The Water Board should wait to address this complex issue. The Water Recycling Policy has set forth a program of research of CECs through the Blue Ribbon Panel. As that Panel makes some determinations and they are brought before the Water Board for consideration, with input from the public and the California Department of Public Health, a more informed decision could be made providing needed clarification to required monitoring or action.

Recommendation: Request that the State Board delete all references to CECs from the draft General Permit.

2. Order – B. Specification 14

The Prohibition states:

14. Recycled water shall be managed to avoid contact with workers. Employees and eating areas shall be protected against any contact with recycled water spray, mist, and runoff.

Recommendation: This prohibition should only apply to those employees who routinely work with such water.

3. Best Management Practices I (C)

The Best Management Practice states:

- C. Refraining from application during precipitation events.

Recommendation: Request that the Water Board allow an exception for special circumstances, including allowing recycled water to be used to flush salts deposited during ocean storm surges onto adjoining landscaped areas.

4. Best Management Practices II (B)

The Best Management Practice states:

- B. The recycled water use supervisor ensures that all recycled water facilities are maintained, operated and repaired at all times in a manner that does not cause illness or injury to any person and in a manner that does not cause damage or injury to the real or personal property of any person or entity.

Recommendation: The statement as written is too burdensome. The statement should be revised to say that the supervisor should inspect the facilities and make sure they are in good working order, operated in a safe and efficient manner, and repaired and maintained as needed.

5. Best Management Practices III (A)

The Best Management Practice states:

A. Workers, residents, and the public are made aware of the potential health hazards associated with contact or ingestion of recycled water, and are educated about proper hygienic practices to protect themselves and their families.

Recommendation: The word hazards should be replaced by the word risk.

6. Best Management Practices III (E)

The Best Management Practice states:

E. Precautions are taken to avoid contact of recycled water with food and food is not allowed into areas that are still wet with recycled water.

Recommendation: Request that the Water Board clarify this BMP, as follows: Please clarify that this BMP relates only to workers performing services on or in Recycled Water Use Areas, and not the general public who might be recreating in such areas. For example, golfers may have food in their golf carts during play on Recycled Water Use Areas, and we presume that this BMP is not intended to cover that longstanding situation.

7. Best Management Practices IV (D)

The Best Management Practice states:

D. All sprinkler heads are uniform in brand, model and nozzle size. Where different arcs are needed at the same station, matched precipitation rates by changing nozzles.

Recommendation: Request that the Water Board provide more flexibility. In many situations, different manufacturer's models are used and are necessary under the circumstances. Limiting sprinkler heads as stated in the BMP is too restrictive and impractical.

8. Best Management Practices IV (T)

The Best Management Practice states:

T. Irrigation with recycled water only occurs during periods of minimal public use of the Use Area with consideration given to allow an adequate dry-out time before the Use Area will be used by the public.

Issue: Maintenance workers commonly spot water small dry areas instead of using irrigation systems. Golfers may sometimes play through those areas before they are completely dry.

Recommendation: Request that the Water Board provide more flexibility and remove "...with consideration given to allow an adequate dry-out time before the Use Area will be used by the public."

9. Best Management Practices IV (CC)

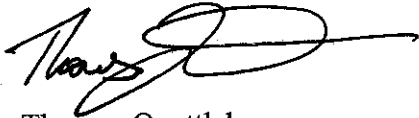
The Best Management Practice states:

CC. Installed storm drain inlet valves or plugs to contain accidental discharges during dry weather

Recommendation: Request that the Water Board limit this BMP to street storm drains adjacent to Recycled Water Use Areas.

Very truly yours,

PEBBLE BEACH COMPANY



Thomas Quattlebaum
Environmental Stewardship Manager

cc. RJ Harper, Pebble Beach Company
Mike McCullough, Northern California Golf Association
Bob Bouchier, California Alliance for Golf